

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
(FLORENCE DIVISION)

DOWNWIND TRADING COMPANY, INC.,)
d/b/a DAMON'S GRILL, a South Carolina)
corporation,)
Plaintiff,)
v.)
FEDERAL INSURANCE COMPANY, an)
Indiana corporation,)
Defendant.)
)

Civil Action No.: 4:22-cv-00889-SAL

**MOTION IN SUPPORT OF PRO HAC
VICE APPLICATION**

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that **Nicholas Daly** be admitted *pro hac vice* in the above-captioned case as associate counsel. As local counsel, I understand that:

1. I will personally sign and include my District of South Carolina federal bar attorney identification number on each pleading, motion, discovery procedure, or other document that I serve or file in this court; and
2. All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number and those of my associate counsel admitted *pro hac vice*; and
3. Service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted *pro hac vice*; and
4. Unless excused by the court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.
5. Certification of Consultation (Local Civil Rule 7.02).
 - ☒ Prior to filing this Motion, I conferred with opposing counsel who has indicated the following position as to this Motion: ☐ will likely oppose; ☒ does not intend to oppose
 - ☐ Prior to filing this Motion, I attempted to confer with opposing counsel but was unable to do so for the following reason(s):

☐ No duty of consultation is required because the opposing party is proceeding pro se.

Gordon Rees Scully Mansukhani, LLP
Firm Name
40 Calhoun Street, Suite 350
Street Address or Post Office Box
Charleston, South Carolina 29401
City, State, Zip Code
843-714-2506
Telephone Number
swall@grsm.com
E-Mail Address

Susan Taylor Wall
Name of Local Counsel
s/ Susan Taylor Wall
Signature of Local Counsel
Local Counsel for the Defendant

District of South Carolina
Federal Bar Number 04502

revised 09/19/05